

SABATINI FREEMAN, LLC

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September 24, 2021

Client Services, Inc  
3451 Harry S Truman Blvd  
Saint Charles, MO 63301

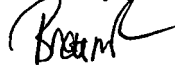
*VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED*

**RE Kehe Palladino v Client Services, Inc  
Pike County Court of Common Pleas  
Docket No 2021-cv-00941**

Dear Sir or Madam

Enclosed please find a time-stamped complaint in the above-referenced matter. Please ensure that all evidence related to this lawsuit is preserved. If you have any question about whether evidence would be related to the lawsuit, please contact me to discuss.

Sincerely yours,



Brett M Freeman

BF/smd

Kelie Palladino  
112 Cottonwood Court  
Milford, PA 18337

Plaintiff

v

Client Services, Inc  
3451 Harry S Truman Blvd  
Saint Charles, MO 63301

Defendant

IN THE PIKE COUNTY  
COURT OF COMMON PLEAS

Civil Action

No

Jury Trial Demanded

2021 SEP 22 PM 12:50  
PIKE COUNTY PA  
CLERK OF COURTS  
RECORDED

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by plaintiff(s). You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PIKE COUNTY COURTHOUSE  
412 BROAD STREET  
MILFORD, PA 18337  
(570) 296-7231

PIKE COUNTY LEGAL AID SERVICES  
810 MONROE STREET  
STROUDSBURG, PA 18360  
(570) 424-5338

PA LAWYER REFERRAL SERVICE  
P O BOX 1086  
100 SOUTH STREET  
HARRISBURG, PA 17108  
(Pennsylvania residents phone  
1-800-692-7375, Out of state  
Residents phone 1-717-238-6715)

FILED OF  
PROCLAMATORY  
CLERK OF COURT,  
2021 SEP 22 PM 12 56  
ENTLUBER RECORD  
PIKE COUNTY PA

Kel Palladino,  
Plaintiff

Client Services, Inc ,  
Defendant

IN THE PIKE COUNTY  
COURT OF COMMON PLEAS

Docket No

## COMPLAINT

### I INTRODUCTION

1 This is an action for damages brought by an individual consumer for violations of the Fair Debt Collection Practices Act, 15 U S C § 1692, *et seq* (hereinafter “the Act”) Defendant illegally disclosed information about Plaintiff to a third-party, in direct violation of the Act

### II JURISDICTION AND VENUE

2 Jurisdiction of this Court is proper pursuant to 15 U S C § 1692k(d), which permits an action under the Act to be brought in any court of competent jurisdiction

3 Venue in this Court is proper in that Plaintiff resides here, the conduct complained of occurred here, and Defendant transacts business here

### III PARTIES

4 Plaintiff is a natural person residing at 112 Cottonwood Court, Milford, PA, 18337

5 Plaintiff is, and at all relevant times was, a “consumer” as defined by 15 U S C § 1692a(3)

6 Client Services, Inc is an entity with an address of 3451 Harry S Truman Blvd , Saint Charles, MO 63301

7 The principal purpose of Defendant’s business is the collection of debts

8 Defendant has reason to believe that a non-trivial portion of the accounts that it collects are for obligations for which the money, property, insurance or services which were the subjects of the transactions were primarily for personal, family, or household purposes

9 Defendant has reason to believe that it is probably true that the principal purpose of its business is the collection of “debt” as that term is defined by 15 U S C § 1692a(5)

10 Defendant regularly attempts to collect debts asserted to be due to another The term “debt” is used in this allegation as that term is defined by 15 U S C § 1692a(5)

11 Defendant is a “debt collector” as defined by 15 U S C § 1692a(6)

#### IV STATEMENT OF CLAIM

12 The foregoing paragraphs are incorporated herein by reference

13 Congress enacted the Act to prevent real harm Congress found that “abusive debt collection practices [we]re carried on to a substantial extent in interstate commerce and through means and instrumentalities of such commerce ” 15 U S C § 1692(d)

14 One of the abusive debt collection practices the Act was designed to curb was “invasions of individual privacy ” 15 U S C § 1692(a)

15 In order to help achieve this goal, the Act prohibits, absent a few exceptions not relevant to the present matter, a debt collector from communicating with a third-party in connection with the collection of a debt 15 U S C § 1692c(b)

16 Client Services Inc is a company which was attempting to collect an alleged debt (“the Debt”) from Plaintiff

17 On or shortly before April 8, 2021, Client Services, Inc decided to send a letter to Plaintiff regarding the Debt

18 However, rather than preparing and mailing the letter to Plaintiff on its own, Client Services, Inc chose to utilize a third-party vendor to perform these services on its behalf. The factual contentions in this paragraph will likely have evidentiary support after a reasonable opportunity for further investigation or discovery.

19 As part of this process, Client Services, Inc conveyed information regarding the Debt to the third-party vendor.

20 The information Client Services, Inc conveyed to the third-party included Plaintiff's name, address, status as a debtor, as well as the precise amount of the Debt and the entity to which Plaintiff allegedly owed the Debt.

21 The conveyance of this information to the third-party constituted a "communication" as that term is defined in 15 U.S.C. § 1692a(2).

22 The conveyance of this information to the third party was a communication made in connection with the collection of a debt. *See Hunstein v Preferred Collection & Mgmt Servs Inc*, 994 F.3d 1341 (11th Cir. 2021).

23 The third-party then, at the direction of Client Services, Inc, utilized this information to generate and mail a letter to Plaintiff.

24 This collection letter was a "communication" as that term is defined in 15 U.S.C. § 1692a(2).

25 The collection letter was mailed on or about April 8, 2021.

26 Plaintiff never consented to Client Services, Inc communicating with the third-party vendor in connection with the collection of the Debt.

27 By improperly conveying information regarding Plaintiff to a third-party in connection with the collection of a debt, Client Services, Inc violated 15 U S C § 1692c(b) *See Hunstein v Preferred Collection & Mgmt Servs Inc* , 994 F 3d 1341 (11th Cir 2021)

WHEREFORE, Plaintiff demands judgment against Defendant for statutory damages of no more than \$1,000 00, costs, attorney's fees, and such other and further relief as deemed just and proper

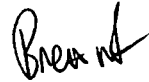
V ARBITRATION

28 The claims raised in this complaint are subject to a pre-dispute arbitration provision

29 Pursuant to Pennsylvania Rule of Civil Procedure 1329, Plaintiff is providing notice of an intention to compel arbitration

VI DEMAND FOR JURY TRIAL

30 Plaintiff demands a trial by jury as to all issues so triable



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Brett Freeman  
Bar Number PA 308834  
Sabatini Freeman, LLC  
216 N Blakely St  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000

**CERTIFICATION OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents

*Brett Freeman*

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Brett Freeman  
Bar Number PA 308834  
Sabatini Freeman, LLC  
216 N Blakely St  
Dunmore, PA 18512  
Attorney for Plaintiff  
Phone (570) 341-9000

OFFICE OF  
PROthonOTARY  
CLERK OF COURTS  
2021 SEP 22 PM 12:50  
ENTERED IN RECORD  
PIKE COUNTY PA

**Verification of Complaint and Certification by Plaintiff**

Plaintiff, Kelie Palladino, being duly sworn according to law, deposes as follows

- 1 I am a plaintiff in this civil proceeding
- 2 I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry
- 3 I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification, or reversal of existing law
- 4 I believe that this civil Complaint is not interposed for any improper purpose, such as to harass the Defendant, cause unnecessary delay to the Defendant, or create a needless increase in the cost of litigation to the Defendant, named in the Complaint
- 5 I have filed this civil Complaint in good faith and solely for the purposes set forth in it

I declare under penalty of perjury that the foregoing is true and correct

Executed on 09-16-2021


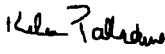

Kelie Palladino  
Kelie Palladino, Plaintiff



# Signature Certificate

Document Ref- FTAQY-YYQFD-IT847-HFA86

Document signed by

	<b>Kelie Palladino</b>	
	Verified E-mail kelie63@yahoo.com	
24.115.111.165	16 Sep 2021 21:07:23 UTC	

Document completed by all parties on

16 Sep 2021 21 07 23 UTC

Page 1 of 1



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Sabatini Freeman L' C  
216 N Blakely Street  
Dunmore PA 18512

**CERTIFIED MAIL**



7021 0350 0001 7403 6175

LET  
24



1000



63301

U.S. POSTAGE PAID  
FOR LETTER  
DUNMORE PA  
18512  
SEP 24 21  
AMOUNT  
**\$7.58**  
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*M. only*  
*9/28/21*  
*LC*

Client Services Inc  
3451 Harry S Truman Blvd  
Saint Charles MO 63301

63301-981699



